

## **Equality Impact Assessment (EQIA)**

In completing this EQIA you should be ensuring the needs of diverse groups of people are thought about when developing and implementing a new policy, procedure or service or a change to existing ones. Please consider the protected groups in line with the Equality Act 2010 and other diverse groups who may be impacted.

<b>Name of Activity</b>	Policy 26 Managing an ILF award
<b>Name of person completing EQIA</b>	Linda Scott
<b>Date EQIA completed</b>	05/10/2022

What type of activity are you planning?	(x)
Change to procedure	<input type="checkbox"/>
Event	<input type="checkbox"/>
New procedure	<input type="checkbox"/>
Office Plan/Budget	<input type="checkbox"/>
Policy	<input checked="" type="checkbox"/>
Project	<input type="checkbox"/>
Service	<input type="checkbox"/>
Other (free text box)	<input type="checkbox"/>

1	Describe the main aim or purpose of what it is you are planning to do?
	<p>We are planning to revise Policy 26 to make the relationship clearer between Award Manager and PA, and between legal appointee / guardian and Award Manager / PA.</p> <p>We all want to refresh the policy language.</p>

2	Who is likely to be affected by this policy, service or change?
	All 2015 fund ILF recipients. Transition Fund recipients will be covered by TF Policy 06.

<p><b>3</b></p>	<p><b>Do you have enough information to know what the potential impact might be on diverse groups and what that might look like?</b></p> <p>The protected characteristics to consider are: Age, Disability, Sex, Race, Religion or Belief, Gender Reassignment, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity. It will also be helpful to consider these groups more widely in relation to their socio-economic status that includes such factors as educational attainment, occupation, income, wealth and social deprivation.</p> <p>Please mark as Yes or No. If yes use the Comments column to describe what the potential impact is. What are your sources of evidence?</p> <p>(Try to think about both positive and negative impacts. There are lots of sources of data to help answer this question. Diversity Networks, the Diversity Report or Diversity &amp; Inclusion team may offer some useful information. Previously completed EQIAs may also offer answers to questions you may have).</p>			
		<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>Comments</b></p>

Age	X		<p>The Award Manager / Appointee are often elderly parents and therefore tend to be already under considerable stress associated with their caring role, and adjusting to recovery from the impact of Covid 19. Any change in this policy may cause anxiety or imply that the Award Manager / Appointee is inadvertently doing “something wrong”. Current identified numbers are less than 50 cases approx.</p> <p>Sources:</p> <p><a href="#">Covid-19 in Scotland: The impact on unpaid carers and carer service support workers (Carers Trust Scotland)</a></p> <p><a href="#">Looming crisis for older family carers of people with learning disabilities (University of Bath)</a></p>
Disability	X		<p>Recipients are already a disadvantaged group; changes to the Award management or change of PA could be stressful due to limitations recruiting a replacement, or the significant or costly legal process required to change the Appointee/Guardian/PoA to another appropriate adult . Both scenarios could lead to disruption of the Award and / or care and support arrangements.</p>
Gender Reassignment		X	
Marriage and Civil Partnership		X	
Pregnancy and Maternity		X	
Race		X	

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		<b>Yes</b>	<b>No</b>	<b>Comments</b>
	Religion or belief		X	
	Sex	X		<p>Evidence shows carers are more likely to be female and also manage the household budget; if they are the paid PA they likely will lose their income, which will impact the overall household income.</p> <p>Sources: <a href="#">Information on Carers - Carers Census, Scotland, 2019-20 and 2020-21 (Scottish Government)</a></p> <p><a href="#">Equality analysis - Poverty and Income Inequality in Scotland 2016-19 (Scottish Government)</a></p>

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		<b>Yes</b>	<b>No</b>	<b>Comments</b>
	Sexual orientation		X	

**Is there evidence of any impact on other groups not covered by the protected characteristics? If yes use the Comments column to describe what the potential impact is, what you could do to remove/reduce any negative impact and what you could do to benefit from any positive impact.**

(For example, carer status, single parent, economic exclusion. It is important not to limit your thinking just to the protected characteristics listed above. This question is broadening the EQIA out to be more inclusive. The impact might be a negative one (e.g. making that decision could decrease the opportunity for some people to participate) or it could be a positive one (e.g. by making that decision, more people are able to take part in the activity).)

	Yes	No	Comments
Carers	X		There is potential for some Award Managers to move from paid PA to informal carer. The negative impact is a loss of income however the positive impact is that as an informal carer there is clearer categorisation which opens up access to other types of supports (carer allowance / carers assessment / carer support organisations)

**4 Have you consulted with the relevant groups (these could be internal and/or external) or gathered evidence for you to know the potential impact on these different groups affected? What sources have you used to gather information?**

If there are any gaps in information that make it difficult or impossible to form an opinion on how your policy, service or change might affect different groups of people, please take the time to gather information to help you make an informed answer (for example, review statistics, survey results, complaints analysis, consultation documents, customer feedback, existing briefings submissions or business reports, comparative policies from external sources and other Government Departments etc).

<b>4</b>	<b>Have you consulted with the relevant groups (these could be internal and/or external) or gathered evidence for you to know the potential impact on these different groups affected? What sources have you used to gather information?</b>
	<p>We have consulted with Assessors, Caseworkers, our Stakeholder Groups in Scotland and NI, our Advisory Group, Forth Valley Carers Support Group, our Sponsor Team and our Legal Adviser. We sought to understand the legal position of our policy, and the wider impact for Recipients, Award Managers, PAs and the wider impact for our staff.</p> <p>To determine the prevalence of this issue, Caseworkers interrogated ICI, and discussed individual circumstances previously as part of their welfare / wellbeing calls during the pandemic.</p> <p>In response to the negative impacts identified we have included a mitigating factor that permits additional time (within a timeframe reasonable in the judgement of ILFS ) on a temporary basis until any legal issues are resolved.</p>

<b>5</b>	<b>Having analysed the relevant sources of information, what does the evidence tell you? Is there any evidence that the proposed changes will have an adverse equality impact on any of these different groups of people?</b>			
		<b>Yes</b>	<b>No</b>	<b>Comments</b>
	Age	X		See sections above
	Disability	X		See sections above
	Gender Reassignment		X	



5	Having analysed the relevant sources of information, what does the evidence tell you? Is there any evidence that the proposed changes will have an adverse equality impact on any of these different groups of people?			
		Yes	No	Comments
	Marriage and Civil Partnership		X	
	Pregnancy and Maternity		X	
	Race		X	
	Religion or belief		X	
	Sex	X		See sections above
	Sexual orientation		X	

<b>6</b>	<b>Please provide details of who the proposals affect, the adverse impacts and explain how you will minimise or remove the adverse impact.</b>
	Any cases identified will be handled with sensitivity; Assessors and Caseworkers will provide advice and support, and we recognise the need to provide a reasonable timeframe for any changes in Award Manager / PA to be made.

<b>7</b>	<b>Is there any evidence that the proposed changes will have a positive impact on any of these different groups of people and/or promote equality of opportunity? Please provide details of which group/ groups benefits from the positive impacts. and how this will be promoted/evaluated.</b>			
		<b>Yes</b>	<b>No</b>	<b>Comments</b>
	Age		X	
	Disability		X	
	Gender Reassignment		X	
	Marriage and Civil Partnership		X	
	Pregnancy and Maternity		X	
	Race		X	

<b>7</b>	<b>Is there any evidence that the proposed changes will have a positive impact on any of these different groups of people and/or promote equality of opportunity? Please provide details of which group/ groups benefits from the positive impacts. and how this will be promoted/evaluated.</b>			
		<b>Yes</b>	<b>No</b>	<b>Comments</b>
	Religion or belief		X	
	Sex		X	
	Sexual orientation		X	

<b>8</b>	<b>Provide a final summary of the commitments/actions you will take as a result of completing this EQIA. Who will you consult with on your action plan and how will you do this to ensure the relevant stakeholders understand the equality impact?</b>			
	Once approved by our Sponsor Team / Scottish Government, we will provide training for Assessors and Caseworkers to ensure they are aware of any potential negative impact on recipients and Award Managers, and how to manage any issues Recipients / Award Managers may experience.			

<b>9</b>	<b>Have you a plan in place to review your actions? Please provide a summary. Will plan require sign off and from where.</b>
	We will monitor the impact of policy changes through feedback from Assessors, Case Workers and feedback from Recipients / Award Managers. We will build any additional impact information into the next annual review of Policy 26. Our Director of Policy will sign off on any subsequent changes to the EQIA.